IN THE UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF PENNSYLVANIA

WILLIAM D. TURNER, PLAINTIFF.

VS.

JOHN E. WETZEL., et al., *
Defendants.

LETTER BRIEF IN SUPPORT OF MOTION SUMMARY OF JUDGMENT

THIRD CIRCUIT NO. 21-2879

CIV. ACTION NO. 4:18-cv-00361.

(BRANN, C.J.) (SAPORITO, M.J.)

SCRANTON FEB 10 2023 PER DEPUTY CLERK

LETTER BRIEF IN SUPPORT OF MOTION SUMMARY OF JUDGMENT

Plaintiff Turner files this brief in support of, summary of judgment; by the findings in Turner v. Wetzel, 2022 U.S. App. LEXIS 23124. NO. 21-2897. Where the Third Circuit vacated the District Court's September 28, 2021 judgment to the extent that it granted summary judgment in favor of th[e] "medical-defendants on Turner's Eighth Amendment claims.

Plaintiff moves in support of by the findings in Davis v Wetzel, Civil Action NO. 1:18-cv-00804 where the Court for the Middle District, held that "creating and/or enforcing a policy that denied necessary medical treatment to a suffering inmate; for non-medical reasons" violated a clearly established right, Wetzel and Noal formulated or approved a medical protocol.

^{*} Former Secretary of Corrections.

Plaintiff Turner also held that the correction, of Mumia Abu-Jamal v. John Kerestes, et al, 2021 U.S. Dist LEXIS 170731 September 9, 2021; restablish Turner's position.; one is [not] cured once the liver becomes cirrhosis proving arbitration, or a trial.

WHEREFORE, by the cases presented warrants relief this Court deems appropriate,

Suggestive Relief

- 1. appoint counsel
- 2. arbitrationa
- 3. trial

Respectfully submitted

Willaim D. Turner AM 5992

SCI Frackville

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Date. 2/6/23.

